

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re

FTX TRADING, LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**Re: D.I. 1858 & 2745**

**CERTIFICATION OF COUNSEL REGARDING ORDER RESOLVING UNITED  
STATES TRUSTEE'S MOTION TO COMPEL THE AD HOC COMMITTEE OF NON-  
US CUSTOMERS OF FTX.COM TO COMPLY WITH THE COURT'S ORDER  
CONCERNING THE VERIFIED STATEMENT OF EVERSHEDES SUTHERLAND (US)  
LLP AND MORRIS, NICHOLS, ARSHT & TUNNELL LLP  
PURSUANT TO BANKRUPTCY RULE 2019**

The undersigned counsel to the Ad Hoc Committee of Non-US Customers of FTX.com (the "Ad Hoc Committee") hereby certifies as follows:

1. On March 22, 2023, the Ad Hoc Committee filed a motion to seal the names and addresses of all its members, whether they be natural persons or entities (D.I. 1137). The Court held a hearing on that motion on June 9, 2023. At the hearing, the Court denied the motion, and subsequently entered an order reflecting its ruling on July 10, 2023 (D.I. 1858), requiring compliance within thirty (30) days.

2. On August 9, 2023, the Ad Hoc Committee filed the *Verified Second Supplemental Statement of Eversheds Sutherland (US) LLP and Morris, Nichols, Arsht & Tunnell*

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<sup>1</sup> The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification numbers are 3288 and 4063, respectively. Due to the large number of debtors in these chapter 11 cases, a complete list of the debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the debtors' claims and noticing agent's website at <https://cases.ra.kroll.com/FTX>.

*LLP Pursuant to Bankruptcy Rule 2019 (D.I. 2144) (the “Verified Statement”), publicly disclosing information required by Bankruptcy Rule 2019 (i.e., the names of members, their economic interests, and listing Eversheds Sutherland (US) LLP as the designated noticing address for each of the members).*

3. On September 28, 2023, the Office of the United States Trustee (the “U.S. Trustee”) filed a *Motion to Compel the Ad Hoc Committee of Non-US Customers of FTX.com to Comply with the Court’s Order Concerning the Verified Statement of Eversheds Sutherland (US) LLP and Morris, Nichols, Arsht & Tunnell LLP Pursuant to Bankruptcy Rule 2019 (D.I. 2745) (the “Motion to Compel”)* on the basis that the Verified Statement does not satisfy the requirements of Bankruptcy Rule 2019, or this Court’s Order requiring compliance with same, because the Ad Hoc Committee listed counsel’s address for its members.

4. The deadline to file a response or objection to the relief requested in the Motion to Compel was originally set for October 12, 2023, at 4:00 p.m. (ET) with a hearing scheduled for October 19, 2023, at 10:00 a.m. The U.S. Trustee and Ad Hoc Committee agreed to adjourn the matter to the November 15, 2023 omnibus hearing with the objection deadline extended to November 10, 2023, at 4:00 p.m. (ET) (the “Objection Deadline”).

5. Prior to the Objection Deadline, the U.S. Trustee and the Ad Hoc Committee resolved the Motion to Compel. The Ad Hoc Committee agreed (i) to file on or before November 15, 2023, an amended Verified Statement with the address for each of its entity members publicly disclosed and (ii) to subsequently file on or before November 30, 2023, a further amended Verified Statement with the address for each of its members who are natural persons under seal, with an unredacted version of the further amended Verified Statement to be provided to the Court, the U.S. Trustee, the Official Committee of Unsecured Creditors, and the Debtors.

6. A proposed order reflecting the resolution contemplated above is attached hereto as **Exhibit A**. The U.S. Trustee has had an opportunity to review the proposed form of order and does not object to its entry.

WHEREFORE, the Ad Hoc Committee respectfully requests that the Court enter the proposed order, substantially in the form attached hereto as **Exhibit A**, at its earliest convenience.

Dated: November 14, 2023

/s/ Jonathan M. Weyand

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